



PRIVACY POLICY

PURSUANT TO (EU) REGULATION 2016/679 ("GDPR") AND TO THE NATIONAL LEGISLATION CONCERNING THE PROTECTION OF PERSONAL DATA IN FORCE
(ver. 16/08/2021)

	DEFINITION OF "DATA"
	<p>"Data" means:</p> <ul style="list-style-type: none"> - Non-sensitive data: personal data processed by Companies during Site navigation following user registration, such as name, surname, gender, place/country and date of birth, contact language, e-mail address and password, information about products/services purchased and any other data (such as tax code and payment information) required for the purchase and issue of tickets and/or season tickets and other data (photograph, residence, address) required in order to issue the Supporter Card (Cuore Rossonero Card); If you are a minor, the data processed will be the name, surname, place and date of birth of the person who exercises parental responsibility - Browsing data: information acquired from computer systems and software procedures that is used to ensure routine operation of the Site; this information is not collected in order to be associated with identified data subjects but may, through processing and association with data held by third parties, allow identification of users; this category of data includes IP addresses or domain names of computers used by users who connect to the site, URI addresses (Uniform Resource Identifier) of requested resources, the time of the request, the method utilized to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters related to the operating system and the IT environment of the user. - Data related to dispositions: when purchasing tickets to enter the stadium or issuing and/or revoking a Supporter Card, data may also be processed relating to penal or administrative dispositions entailing a ban on entry into stadiums, if so communicated to AC Milan S.p.A. and/or Milan Entertainment S.r.l. by the competent authorities; this scope also includes judicial data that may be processed by Companies concerning offenses and crimes committed by persons who access the Stadium and who breach the "Regulatory Code of the transfer of access tickets to football events" enforced by AC Milan S.p.A.

	DATA SOURCE AND CATEGORIES OF DATA COLLECTED c/o THIRD PARTIES
	<p>Data are collected from the data subject (and thereby directly made available by you) while navigating the web site and any other web sites in which this Privacy Policy is published, as well as within the scope of services and products provided by them. Data relating to dispositions, on the other hand, may be communicated to AC Milan S.p.A by the competent authorities.</p>

	PURPOSES OF PROCESSING		LAWFULNESS OF PROCESSING	OF		DATA RETENTION PERIOD
Data are processed by AC Milan S.p.A. . as holder of the processing for						
Ticket management - Purchase and issuing tickets and / or season tickets: non-sensitive data such as an example name, surname, gender, place / country and date of birth and tax code are processed for the issue of the ticket and / or season ticket and the provision of related services, comprehending possible refunds or donations. The non-sensitive data and those relating to official measures can also be processed to inhibit access to the Stadium also following communications to the Police Headquarters pursuant to Ministerial Decree 15 August 2009.		Fulfilment of contractual obligations			5 years from the date of purchase of the ticket and/or season ticket	
		Fulfilment of a legal obligation to which the data controller is subject			Data related to refunds will be kept until the end of the sporting season following the one to which they refer.	
Ticket Management – Management of the Carta Cuore Rossonero: the non-sensitive data required for the Carta Cuore Rossonero are processed for the purpose of issuing and activating the provision of services, facilities and privileges connected with it (such as, for		Fulfilment of contractual obligations			Ten years from the end of the sporting season to which the Card refers for possible administrative checks and/or for the management of a court litigation	
		Legitimate interest of the companies				



example but not limited to, pre-sales, promotions on tickets for AC Milan SpA home matches, dedicated events, discounts on services and products), made available at the discretion of AC Milan SpA, including the sending of communications (also by electronic means) strictly pertaining to the contractual relationship and the benefits deriving therefrom, as well as the management of specific user requests. In particular, the identification document and your photo image are required for the identification of the buyer in the case of online purchase. The non-sensitive data and those relating to official measures can also be processed for the cancellation of the Supporter Card or to inhibit the possibility of uploading tickets and / or using the Card	Fulfilment of a legal obligation to which the data controller is subject	
Ticket management – Issue of passes release: non-sensitive data such as name, surname, place and date of birth, job and company, are required and processed for the issue of the passes for the subjects who must enter the stadium for service reasons	Fulfilment of contractual obligations	For the duration of the current season
Application of the Code of Regulation for the transfer of admission ticket to football events: non-sensitive data relating to official measures of those who access the Stadium are treated for verify compliance with the Code of Regulation of the transfer of admission tickets to football events enforced by AC Milan S.p.A. and to prevent entry to those who violate this code. The data of those who are not allowed to enter at the Stadium they are kept in a dedicated database	Compliance with a legal obligation to which the Companies are subject	10 years from the collection of the data to comply with the obligations relevant to the possible reiteration of the crime
Authorization requests to Banners and / or choreographies: non-sensitive data are processed review the requests also by forwarding the content of the banner to the competent Authorities for the purposes of the release of the authorization of the exhibition or to perform the choreographies	Compliance with a legal obligation to which the Companies are subject	For the duration of the current season
Data are processed by AC Milan S.p.A. and Milan Entertainment S.r.l. as co-holders of the processing for:		
Website Navigation: navigation data are only used to obtain anonymous statistical information about the use of the web site and to verify correct operation. Navigation data may be used to ascertain responsibility in the event of possible computer crimes against the Website.	Legitimate interest of the companies.	Navigation data are deleted immediately after processing or made anonymous.
Registration in the confidential area of the web site and creation of the account: non-sensitive data are used to fill in the online form, where personal details are indicated (e.g. name, surname, date and place of birth, gender, e-mail). These data are required in order to activate authentication credentials	Required in order to execute a request by the data subject or fulfil contractual obligations.	For the duration of the contract and thereby until the user closes the account.



(email + password) which the data subject will then use to access all areas and services of the Website exclusively for registered users.		
Purchase of products or services: non-sensitive data (e.g. name, surname, e-mail address, residence address, telephone) are required in order to execute purchases, ensure shipment of purchased products (and related commercial invoices), notify the user about transactions made, purchase tickets for entry into the Stadium and purchase tickets for the Mondo Milan Museum.	Fulfilment of contractual obligations.	Ten years from the date of purchase and/or termination of the contract.
Support to the data subject: non-sensitive data are processed in order to recognize the data subject and thereby provide assistance in response to specific requests of the said party regarding products or services provided by the Company or in order to optimize the use of services and send service notices regarding the user's profile.	Execution of dispositions implemented after signing the contract in order to improve user services and meet user expectations.	Ten years from the date of purchase and/or termination of the contract.
Disclosure of data related to the participation in specific magazines: any non-sensitive data provided and images and/or personal experiences shared if involved in specific magazines dedicated to supporters and their stories (e.g. the "Rubrica OP-ED ") may be disclosed, following acceptance of a specific release/waiver, published on Internet web sites including social networks, on press and/or any other media.	Consent of the data subject.	Personal data, images and/or personal experiences shared are stored until consent is withdrawn.
Participation in promotions, competitions and prize contests: Non-sensitive data such as name, surname and e-mail of the natural or legal person and data required by specific regulations will be processed for involvement in the initiative.	Fulfilling contractual obligations.	Five years from the termination of the initiative.
Registration for events: non-sensitive data provided also through dedicated forms, will be used for registration requests and for the management of entry lists	Fulfilling contractual obligations.	The date a re cancelled at the end of the relevant event
Direct Marketing sending of promotional and commercial communications relating to the products/services offered by the Companies, using automated contact (such as text messages, e-mails, social networks, instant messaging apps, push notifications) and conventional (such as telephone calls with operator and surface mail) methods, including newsletters/mailling lists, or notification of corporate events, as well as customer satisfaction surveys, market surveys and statistical analysis.	Consent of the data subject.	Withdrawal of consent. Data are stored for 24 months from collection
Soft Spam: sending to the e-mail address provided by you, commercial communications relating to products or services similar to those already purchased. Each sending will allow you to refuse further mailings	Legitimate interest of the companies.	60 months from the last purchase



Profiled Marketing: sending of customized sales communications promotional actions/offers and services tailored to your needs/preferences habits, behaviour patterns and interests through analysis of your purchases (including for example tickets and merchandising products) and the participation in events and initiatives as well as online navigation	Consent of the data subject.	Withdrawal of consent. Data are stored for 24 months from collection
Transfer of data for Third party marketing: marketing carried out by third parties (such as companies selling products and services in categories such as sports clothing and equipment, travel and vehicle services, food, household appliances, office machines, communication and television equipment and services, banking institutions, currency exchange, sports betting and personal hygiene), including Group companies, following the transfer of data. In particular, sending - using automated contact (such as texting and e-mail) and conventional (such as telephone calls with operator and traditional mail) methods - promotional and/or commercial communications and/or newsletters relating to third party products including Group companies, as well as carrying out market studies and statistical analysis.	Consent of the data subject.	Withdrawal of consent.
Communication to Fondazione Milan Onlus: communication of non-sensitive data to Fondazione Milan Onlus in order to send institutional communications and information material via e-mail, telephone and/or printed mail related to the activities of Fondazione Milan Onlus.	Consent of the data subject.	Withdrawal of consent.
Data are processed by AC Milan S.p.A. and Milan Entertainment S.r.l. as co-holders of the processing for:		
Processing for the purpose of preventing the spread of Covid-19 infection: taking body temperature to allow physical access, consultation of green pass, if requested, or self-certification and storage of common data necessary only for the tracking purposes according to the provisions of the Competent Authorities.	Execution of legal obligations to which the Companies are subject.	In case of taking body temperature and consultation of a green pass, no data will be collected and stored.
		In case of self-certification or personal data processed for tracking purposes, only the necessary common data will be stored for 15 days from the date of physical access.
Legal obligations: processing of data, including data related to dispositions, in order to fulfil the obligations defined by national and supranational legislations in force (laws, regulations, including sector-related ones).	Execution of legal obligations to which the Companies are subject.	Ten years from collection.
Defence before the Court and recovery of extrajudicial expenses: all Data may be processed if necessary, ascertain, exercise or defend the rights of the Company before the Court or to recover claims against the data subject.	Legitimate interest of the Companies to defend themselves in court against the data subject.	In the event of judicial litigation, for the entire duration of such action until the terms for appeals are attained.
Data processing is carried out electronically by means of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of		



data. Once the above storage terms have elapsed, Data will be destroyed or rendered anonymous, in keeping with technical cancellation and backup procedures.

Kindly also note that the **Cuore Rossonero Card** has a microchip containing RFID technology, which allows the card to be read by the access turnstiles at the stadium from a distance varying between 1 and 10 centimetres. No data is stored at the turnstiles, which are only enabled to verify that the codes stored on the card match the costs for the event in question



DATA CONFERMENT

Conferment of Data for the following purposes:

- a. **Website Navigation:** compulsory and necessary; failure to provide data may make it impossible to browse the Website;
- b. **Registration in the reserved area of the site and management of the account:** compulsory for registration with the site and use of services exclusively accessible through the reserved area; non-conferment does not affect free navigation of site pages that do not require registration;
- c. **Online purchase of products and services, assistance for data subject:** compulsory to ensure fulfilment of contractual obligations of the data controller as regards the data subject (such as shipment of goods purchased through the online store, release/mailling of the Cuore Rossonero Card);
- d. **Management of tickets – Purchase and issue of tickets and/or season tickets, Management of Supporter Card (Cuore Rossonero card), Issue of Passes and enforcement of the “Regulatory Code of the transfer of access tickets to football events”:** compulsory and necessary for issuing tickets and/or season tickets, badges and passes, as well as to meet the contract and allow access to the Stadium; any refusal to provide data or incompleteness may make it impossible for the Companies to provide services in their entirety and to comply with legal obligations;
- e. **Authorization for Banners and/or Choreographies:** compulsory obtain clearance for the display of banners: incomplete compilation of the form will not allow your request of authorization and it will not therefore be possible to display the banner;
- f. **Disclosure of data related to participation in specific magazines:** optional and non-conferment will not entail any consequences other than the impossibility of taking part in the magazines and, in this context, to share personal images and/or experiences;
- g. **Participation in promotions, competitions and prize draws:** compulsory, non-conferment will not entail any consequences other than the impossibility of taking part in promotions, competitions and prize draws;
- h. **Processing relating to the prevention and countering of the spread of the Covid-19 virus:** it is mandatory to allow the data controller to fulfil the obligations defined by applicable regulations and applicable legislation;
- i. **Legal obligations:** it is compulsory to allow the data controller to fulfil the obligations defined by applicable regulations and laws (laws, regulations, including by sector) on a national and supranational scale;
- j. **Defence before the Court and recovery of extrajudicial expenses** compulsory to ensure the legitimate interest of the data controller to defend itself in court and/or recover a claim against the data subject;
- k. **Direct Marketing, Profiled Marketing, Third Party Marketing** optional and non-conferment will not entail any consequence other than not being able to receive promotions, discounts and commercial communications, including those appropriate to your needs/preferences, and to be informed about any marketing initiatives promoted by third party companies, including those belonging to the Group;
- l. **Communication Fondazione Milan Onlus** optional and non-conferment will not entail any consequence other than not being able to receive institutional communications and informative material about the activities of Fondazione Milan Onlus.



RECIPIENTS OF DATA

Data may be transferred to persons acting as **processing managers**, including particular:

- a. Authorities and supervisory and control bodies and, in general, public or private entities having a right to request such data. In particular, for **Ticket Management - Supporter Card Management (Cuore Rossonero Card)**, **Enforcement of the “Regulatory Code of the transfer of access tickets to football events”** and **Authorisation for Banners and/or Choreographies**, the Security Operative Unit (G.O.S.), State Police and Police Headquarters;
- b. Lawyers, accountants, auditors;
- c. Companies managing call centers relevant to the recording of phone calls to monitor the quality of the service. For info relevant to the names of the companies please see below
- d. Other Group Companies for the purposes indicated above.

Data may be processed, on behalf of the data controller, to allow the performance of the activities described above by persons appointed as **data processing managers**, including, in particular:

- a. Companies that offer e-mailing services for marketing purposes;
- b. Companies that handle website maintenance;
- c. Companies that deal with goods shipment services;



	<p>d. Companies that provide support in carrying out market studies;</p> <p>e. Companies that manage the online store and handle shipping and invoicing of products;</p> <p>f. Companies, including Group companies, which perform intercompany services.</p>
	<p>TRANSFER OF PERSONAL DATA</p> <p>Data will not be disclosed and will not be transferred to non-EU countries. Should this occur, in order to ensure a suitable level of Personal Data protection, the transfer will only be made on the basis of EU decisions relevant to the suitability of the protection or the enforcement, by our companies, of the Standard Contractual Clauses required by the European Commission.</p>
	<p>AUTHORISED DATA PROCESSING SUBJECTS</p> <p>Data may be processed by employees of company departments responsible for achieving the foregoing purposes who have been expressly authorized to process such data and have received appropriate operating instructions.</p>
	<p>RIGHTS OF THE DATA SUBJECT - COMPLAINTS TO THE CONTROL AUTHORITY</p> <p>Companies can be contacted by e-mail at privacy@acmilan.com, whereby data subjects:</p> <ul style="list-style-type: none"> ask the data controller to confirm the existence or otherwise of data processing concerning them and, if so, to obtain access to such data as well as to information about processing, such as: purposes, the categories of personal data, recipients or categories of recipients to whom data may be communicated, the filing period, the existence of an automated decision-making process and the logic used, as well as the existence of appropriate assurances in the event of data transfer to a non-EU country; obtain updating, correction, integration or cancellation of data, as well as processing restrictions; oppose entirely or in part: a) for reasons associated with their specific circumstances, the processing of data for the legitimate interests of the Companies; b) to the processing of personal data concerning them for the purposes of direct marketing and/or profiled marketing carried out using automated (such as text messages, e-mails, social networks, instant messaging apps, push notifications) and conventional (such as phone calls with operator and traditional mail) contact methods; to receive data in a widely used, structured format that can be read by an automatic device, and, if technically feasible, transmit them to another data controller without impediments ("right to data portability"); withdraw any consent granted at any time. <p>Data subjects also have the right to send a complaint to the competent Supervisory Authority.</p>
	<p>In addition, the Companies have appointed a Data Protection Officer (DPO), a specialist figure responsible for monitoring the procedures adopted by our Companies to protect data. You can contact our DPO by writing to dpo@acmilan.com.</p>